

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

Stream TV Networks, Inc., *et al.*¹

The Debtors.

Chapter 11

Bky Case No. 23-10763 (AMC)
(Jointly Administered)

**JOINDER OF REMBRANDT 3D HOLDING LTD TO
MOTION OF VISUAL SEMICONDUCTOR, INC. TO STAY THE ORDER
(A) APPROVING THE SALE OF SUBSTANTIALLY ALL OF THE DEBTORS' ASSETS
FREE AND CLEAR OF ALL LIENS, CLAIMS, ENCUMBRANCES AND INTERESTS,
(B) AUTHORIZING THE TRUSTEE TO ENTER INTO AND PERFORM DEBTORS'
OBLIGATIONS UNDER THE ASSET PURCHASE AGREEMENT, (C) APPROVING
ASSUMPTION AND ASSIGNMENT OF CERTAIN EXECUTORY CONTRACTS
AND UNEXPIRED LEASES, AND (D) GRANTING RELATED RELIEF
PENDING RESOLUTION OF APPEAL**

Rembrandt 3D Holding Ltd (“**Rembrandt**”), by and through undersigned counsel, hereby submits this joinder to the *Motion of Visual Semiconductor, Inc. to Stay the Order (a) Approving the Sale of Substantially all of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances and Interests, (b) Authorizing the Trustee to Enter Into and Perform Debtors' Obligations Under the Asset Purchase Agreement, (c) Approving Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, and (d) Granting Related Relief Pending Resolution Of Appeal* [ECF No. 898] (the “**Stay Motion**”) and in support of this Joinder states as follows:

¹ The Debtors, together with the last four digits of the Debtors' federal tax identification numbers, are Stream TV Networks, Inc. (4092) and Technovative Media, Inc. (5015). The location of the Debtors' service address is: 2009 Chestnut Street, 3rd Floor, Philadelphia, PA 19103.

JOINDER

1. On December 23, 2024, Visual Semiconductor, Inc. (“**VSI**”) filed the Stay Motion seeking to stay the Sale Order², pending resolution of the appeal of the Sale Order. Rembrandt hereby incorporates by reference all arguments made by VSI in the Stay Motion.

2. While distinctions exist in the substance of Rembrandt’s and VSI’s respective appeals, the procedural impact of failing to grant a stay negatively affects Rembrandt in a similar manner to VSI. There is a relevant distinction, however, in that Rembrandt is uniquely affected such that its trade secrets are in danger of being destroyed, which is in itself an irreparable harm. As such, Rembrandt joins in the Stay Motion in its entirety and respectfully request that this Court stay the Sale Order pending resolution of the appeal in order to preserve the only valuable assets of this estate for the benefit of all creditors and equity.

CONCLUSION

Rembrandt respectfully requests that this Court grant the Stay Motion and providing for such other relief as the Court may deem proper.

Dated: January 28, 2025

Respectfully submitted,

DEVLIN LAW FIRM LLC

By: /s/ Andrew DeMarco

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² Capitalized terms used but not otherwise defined herein shall have the meaning ascribed to such terms in the Stay Motion.